

JAP:TJS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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**12M694**

UNITED STATES OF AMERICA

-against-

COMPLAINT AND AFFIDAVIT  
IN SUPPORT OF ARREST WARRANT

ANDREW GOODMAN,

(18 U.S.C. § 2423(a))

Defendant.

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MARA SCHNEIDER, being duly sworn, deposes and states as follows:

Upon information and belief, there is probable cause to believe that, in or about February 2010, within the Eastern District of New York and elsewhere, the defendant ANDREW GOODMAN did knowingly and intentionally transport an individual who had not attained the age of 18 years in interstate commerce to engage in any sexual activity for which any person can be charged with a criminal offense, to wit, sexual assault, pursuant to NJ Stat. § 2C:14-2(c)(4).<sup>1</sup>

(Title 18, United States Code, Section 2423(a))

The source of your deponent's information and the grounds for her belief are as follows:

1. I am a Special Agent with Federal Bureau of

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<sup>1</sup> New Jersey Code of Criminal Justice Section 2C:14-2(c)(4) states that "an actor is guilty of sexual assault if he commits an act of sexual penetration with another person" and "the victim is at least 13 but less than 16 years old and the actor is at least four years older than the victim."

Investigations ("FBI"). I have been an FBI Special Agent since 2008. For approximately four years, I have been assigned to the Crimes Against Children Squad in New York City. In that capacity, I have conducted investigations into federal crimes relating to the sex trafficking of minors, Mann Act violations and child pornography. As an FBI Special Agent, I have conducted or participated in surveillance, the execution of search and arrest warrants, debriefings of informants, victims and witnesses, and have participated in investigations that included the interception of wire communications. Through my training, education and experience, I have become familiar with the manner in which individuals conduct and conceal activity involving the sexual exploitation of children. I am familiar with the facts and circumstances of this investigation from: (a) my personal participation in the investigation; (b) reports made to me by other law enforcement authorities and forensic professionals; and (c) review of records and reports.

2. Unless otherwise noted, wherever in this affidavit I assert that a statement was made, the information was provided by another law enforcement officer or witness who may have had either direct or hearsay knowledge of that statement and to whom I or others have spoken or whose reports I have read and reviewed. Such statements are among many statements made by others and are stated in substance and in part unless otherwise indicated. Since this affidavit is being submitted for the

limited purpose of securing an arrest warrant, I have not included details of every aspect of the investigation. Facts not set forth herein are not being relied on in reaching my conclusion that the requested warrant should be issued. Nor do I request that this Court rely on any facts not set forth herein in reviewing this application.

#### PROBABLE CAUSE

##### Background

3. On or about June 22, 2012, the defendant ANDREW GOODMAN pleaded guilty to 23 counts of Criminal Sexual Act in the Second Degree, in violation of New York Penal Law Section 130.45, and 25 counts of Criminal Sexual Act in the Third Degree, in violation of New York Penal Law Section 130.40, relating to his sexual abuse of minors John Doe 1 and John Doe 2 between 2006 and 2010.

4. On July 12, 2012, GOODMAN was sentenced in Kings County Supreme Court to two years incarceration.

##### Interview of John Doe 1

5. On July 23, 2012, I interviewed John Doe 1. During the interview, John Doe 1 stated, in substance and in part:

a. In 2006, when John Doe 1 was 11 years old, he met GOODMAN. Beginning in approximately summer of 2006, GOODMAN began molesting John Doe 1 by touching his genitals through clothing.

b. Starting in 2007, GOODMAN's molestations of

John Doe 1 escalated after GOODMAN began inviting John Doe 1 to GOODMAN's house. Between 2007 and 2010, GOODMAN had John Doe 1 perform oral sex on GOODMAN, GOODMAN performed oral sex on John Doe 1, and GOODMAN performed anal sex on John Doe 1.

c. On February 13, 2010, GOODMAN took John Doe 1, who was at the time 15 years old, on a trip from Brooklyn, New York to Atlantic City, New Jersey, along with two of GOODMAN's friends. John Doe 1's parents were not aware of the trip.

d. Prior to traveling, one of GOODMAN's friends got hotel reservations for two rooms at an area hotel on February 13, 2010 and one room at the Trump Taj Mahal hotel and casino on February 14, 2010.<sup>2</sup> John Doe 1 indicated that his understanding was that they obtained two hotel reservations at the first hotel so that GOODMAN and John Doe 1 could share one room and GOODMAN's two friends could share another room. They did not get two rooms at the Taj Mahal because GOODMAN or his friends did not want to pay for a separate room.

e. GOODMAN, John Doe 1, and GOODMAN's two friends, then traveled by car from Brooklyn, New York to Atlantic City, New Jersey. They initially went to the Taj Mahal Casino, where the adults gambled.

f. Later in the evening, all four went to the area hotel where they had reserved two rooms. GOODMAN and John

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<sup>2</sup> I have seen records from the Taj Mahal Hotel confirming the reservation on February 14, 2010.

Doe 1 went into one hotel room and GOODMAN's friends went into the other hotel room. The room had two beds. GOODMAN got into one bed. John Doe 1 got into the other bed. GOODMAN then came over to John Doe 1's bed. GOODMAN and John Doe 1 then engaged in oral sex and anal sex.

g. John Doe 1 and GOODMAN both showered. GOODMAN then slept in the bed with John Doe 1.

h. The next day they had breakfast at a diner located near the hotel and went to the Trump Taj Mahal Casino. They spent most of the day at the Trump Taj Mahal Casino and then traveled to the Borgata Casino and attended a Kid Rock Concert.<sup>3</sup> They then had dinner at the Borgata and returned to the Trump Taj Mahal, where all four stayed in the same room.

i. On February 15, 2010, John Doe 1, GOODMAN, and GOODMAN's friends traveled to Lakewood, New Jersey. John Doe 1 then took a bus back to Brooklyn, New York.

5. Based on records checks, I have learned that GOODMAN's date of birth is in June 1984. Therefore, as of February 2010, GOODMAN was 25 years old.

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<sup>3</sup> Internet searches indicate that Kid Rock performed at the Borgata on February 14, 2010.

CONCLUSION

6. WHEREFORE, your deponent respectfully requests that the defendant ANDREW GOODMAN be arrested so that he may be dealt with according to law.

Mara R. Schneider  
Mara Schneider, Special Agent  
Federal Bureau of Investigations

Sworn to and subscribed before me  
this 24th day of July, 2012

THE HONORABLE JOAN M. AZRACK  
United States Magistrate Judge